

**BEFORE THE ARKANSAS PUBLIC SERVICE COMMISSION**

<b>IN THE MATTER OF ALL REQUIRED</b>	)	
<b>GAS SUPPLY RATE FILINGS BY</b>	)	<b>DOCKET NO. 07-044-U</b>
<b>SUMMIT UTILITIES ARKANSAS, INC. (GAS</b>	)	
<b>SUPPLY RATES - GSR)</b>	)	
	)	
<b>IN THE MATTER OF THE BILLING PRACTICES</b>	)	<b>DOCKET NO. 23-_____</b>
<b>OF SUMMIT UTILITIES ARKANSAS, INC.</b>	)	

**MOTION**

For its motion that the Arkansas Public Service Commission (“Commission” or “APSC”) open separate investigations of the natural gas costs and billing practices of Summit Utilities Arkansas, Inc., (“Summit” or “Company”), the Office of Attorney General Tim Griffin states:

**I. Introduction**

1. Summit closed on its deal to acquire the Arkansas natural gas utility assets of CenterPoint Energy Resources Corp. (“CenterPoint”) in January 2022. By November of 2022, Summit finalized the transfer of billing services for former CenterPoint customers to its own billing system. Two months later, in January 2023, the Office of the Attorney General (“Attorney General”) began receiving substantial numbers of complaints from consumers regarding Summit natural gas bills. Over the subsequent two months leading up to the date of the filing of this motion, the Attorney General has received an extraordinary number of consumer complaints regarding Summit natural gas bills, totaling well in excess of 2,000 complaints.

2. One driver of the increase in complaints is the Gas Supply Rate (“GSR”) that is charged by Summit on a per unit basis for the natural gas commodity that it delivers to its customers. Summit’s current residential GSR of \$1.224 per CCF went into effect on November 1,

2022. This is a 35% increase above the prior winter's rate of \$0.906 per CCF. A second contributing factor is that natural gas usage increases in the winter, particularly for those consumers who use natural gas to heat their homes. For most customers, their January bills reflect high natural gas usage caused by Winter Storm Elliott, which brought extremely cold temperatures to Arkansas in late December 2022. A third contributing factor is that, for many customers, the usage measured for January bills was based on a 34- or 35-day billing cycle that was up to a week longer than their December bills.

3. However, the unprecedented number of complaints received by the Attorney General from consumers regarding Summit natural gas bills strongly suggests that the issues to be addressed extend far beyond the inflated GSR paired with a seasonal increase in usage and longer billing cycles. For purposes of comparison, the Attorney General has received only seven (7) complaints regarding Black Hills Energy Arkansas, Inc., and no complaints regarding Arkansas Oklahoma Gas Corporation, in same time period.

4. In late January, after being apprised of the many complaints received by the Attorney General, Summit informed customers that due to an error that it characterized as a "data processing issue," approximately 167,000 customers in Arkansas and Oklahoma received bills dated between January 17-24, 2023, that were based on estimates determined by prior year usage rather than actual metered usage. **Exhibit A** to this motion is a copy of the notice Summit provided to customers informing them about the inaccurate usage. **Exhibit B** is an example of a consumer's erroneous January estimated bill along with the subsequent corrected January bill. The first bill, dated January 24, 2023, reflects estimated usage of 260 CCF and an amount due of \$603.43. The second bill, dated January 30, 2023, reflects actual usage of 20 CCF and a new amount due of \$92.60 excluding the \$150 deposit amount that has been added to the corrected bill. These bills

reflect a situation that involves a building that was not occupied in December of 2022 but had been occupied a year earlier. The estimated bill was based on usage the prior year when the building was occupied and resulted in a rather extreme outcome. While the majority of customers who were affected by Summit's estimated billing issue saw their corrected January bill go down to some extent relative to their erroneous estimated bill, some customers in fact saw an increase.

5. The Attorney General discovered another problem with Summit gas bills that arose from an issue with the transfer of information from CenterPoint to Summit. Via complaints received from consumers, the Attorney General determined that there were numerous instances in which payments that consumers made to CenterPoint were not credited to Summit customer bills upon the transfer of those customer accounts from CenterPoint to Summit. **Exhibit C** to this motion documents an example of this issue. The first bill, dated October 21, 2022, which reflects current charges and an amount due of \$44.19, is from before the final transition of billing services from CenterPoint to Summit. Note that this bill includes a notice referencing the upcoming transition of customer service and billing services to Summit. The second bill is dated November 21, 2022 and comes after the transition to Summit's billing system. It reflects a balance forward of \$44.19 which is added to the current statement charges of \$86.39 for a total amount due of \$130.58, despite the consumer already having paid the \$44.19. The third and final bill is dated January 30, 2023, and still reflects a balance forward of \$44.19 included in the total amount shown to be due. After being alerted to the Attorney General's findings, Summit subsequently determined that the CenterPoint payment processing system was holding payments made by 510 Summit customers in Arkansas, totaling approximately \$47,000.

6. In February, the Attorney General discovered yet another billing issue impacting Summit customers. As previously indicated, the 167,000 Summit customers in Arkansas and

Oklahoma who were affected by the January estimated bill issue received a corrected January bill along with additional time to pay the bill. This additional time to pay caused an additional issue for many of these customers when they received their February bill. Customers on autopay, which processes on the bill's due date, as well as non-autopay customers who had not yet paid their January bill because of the extended period provided for payment, received a February bill with a total amount due reflecting the sum of the January bill and the new charges for February. For many Arkansans already struggling to pay high gas bills this winter, this added insult to injury when they saw the large number at the bottom of their February bill. **Exhibit D** attached hereto is an example of such a bill. Despite the customer's only owing \$438.84 for current charges, the bill shows a total amount due of \$867.14.

## II. The Parties

7. Under the Consumer Utilities Rate Advocacy Division Act<sup>1</sup>, the Attorney General represents “the state, its subdivisions, and all classes of Arkansas utility rate payers . . . [t]o provide effective and aggressive representation for the people of Arkansas in hearings before the Arkansas Public Service Commission and other state and federal courts or agencies concerning utility-related matters.”<sup>2</sup>

8. Summit is a public utility regulated by the Commission. Summit is owned by Southern Col Midco, LLC. On January 10, 2022, Summit acquired the natural gas distribution assets of CenterPoint in Arkansas.<sup>3</sup>

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<sup>1</sup> Ark. Code Ann. § 23-4-301, *et seq.*

<sup>2</sup> Ark. Code Ann. § 23-4-305(1).

<sup>3</sup> APSC Docket No. 21-060-U, Doc. No. 146. The Commission approved the acquisition on December 6, 2021. *In the Matter of CenterPoint Energy Resources Corp. and Summit Utilities Arkansas, Inc. for all Necessary Authorizations and Approvals for Summit Utilities Arkansas, Inc. to Acquire the Arkansas Assets of CenterPoint Energy Resources Corp. and for Approval of a Certificate of Public Convenience and Necessity for Summit Utilities Arkansas, Inc.*, Docket No. 21-060-U, Order No. 11 (Dec. 6, 2021).

### III. Jurisdiction and Venue

9. Pursuant to Ark. Code Ann. § 23-4-201(a)(1), the Commission has sole and exclusive jurisdiction to hear claims involving rates charged to Summit’s Arkansas customers.<sup>4</sup>

10. Under Ark. Code Ann. § 23-1-101(10), the term “rate” is broadly defined to include “any rules, regulations, practices, or contracts affecting any compensation, charge, fare, toll, rental, or classification.”<sup>5</sup> For purposes of this Motion, the term “rate” includes both the GSR and Summit’s billing practices.

11. The Arkansas Supreme Court has held that “[t]here is no dispute . . . that in performing its legislatively delegated function of rate making the PSC has broad discretion . . . . It was created by the General Assembly and possesses the same power as the General Assembly while acting within the powers conferred upon it.”<sup>6</sup>

### IV. Gas Costs

12. Natural gas utilities are required “to take reasonable and prudent steps to diversify their supply portfolios, procure reasonably-priced gas supplies, mitigate gas price volatility, and increase both educational efforts and gas supply pricing options for gas consumers.”<sup>7</sup>

13. Ark. Code Ann. § 23-15-103(a)(1) requires that natural gas utilities purchase natural gas for resale “from the lowest or most advantageous market.”

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<sup>4</sup> *CenterPoint Energy, Inc. v. Miller County Circuit Court, Second Div.*, 370 Ark. 190, 197-198, 258 S.W.3d 336, 341 (2007); *Cullum v. Seagull Mid-South, Inc.*, 322 Ark. 190, 194, 907 S.W.2d 741, 743 (1995).

<sup>5</sup> *Id.*

<sup>6</sup> *City of Fort Smith v. Arkansas Public Service Commission*, 278 Ark. 521, 525-26, 648 S.W.2d 40, 42 (1983).

<sup>7</sup> Arkansas Public Service Commission, Natural Gas Procurement Plan Rules at p. 2; *In the Matter of a Notice of Inquiry into Whether Arkansas Gas Utilities Should Integrate Gas Price hedging, Fixed Price Options, and Other Alternative Mechanisms into Gas Procurement Plans*, Order No. 3, Docket No. 01-023-NOI (Jun. 20, 2001)

14. Ark. Code Ann. § 23-15-103(a)(2) provides that a natural gas utility that fails to comply with this least-cost standard must refund or credit to customers “the difference between the market price and the price at which the purchase is made.”<sup>8</sup>

15. On April 23, 2007, the Commission opened Docket No. 07-044-U to receive GSR filings by CenterPoint. The docket has also been used to address matters relating to CenterPoint’s and Summit’s gas costs.

16. On September 11, 2018, the Attorney General filed a letter in Docket No. 07-044-U expressing its intent to be an active party in the docket.

17. Citing the extremely high natural gas prices, the Commission expanded the scope of Docket No. 07-044-U to include an investigation of the prudence of extraordinary gas costs incurred as a result of Winter Storm Uri.<sup>9</sup> This followed the opening of “an investigation into the utilities’ preparation, response, operational performance and communication regarding the winter weather events in February 2021, impacts on customers, best practices, and lessons learned going forward.”<sup>10</sup>

18. The Company has stated that the overall price of natural gas is, in part, to blame for its recent high gas bills. Factors it cites as contributing to the higher natural gas prices have include the war in Ukraine, European supply, federal policies, and remaining issues from COVID-19.<sup>11</sup>

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<sup>8</sup> See *In the Matter of an Investigation into the Overall Gas Purchasing Practices of Arkla, Inc. and its Various Subsidiary Companies Including, but not Limited to, the Arkla-Arkoma Transactions*, Docket 90-036-U, Order No. 32 (Dec. 27, 1990).

<sup>9</sup> Order No. 11 (Feb. 2, 2023)

<sup>10</sup> *In the Matter of an Investigation into The Operations, Procedures, and Performances of the Regulated Utilities During the Winter Weather Event in February 2021*, Docket No. 21-036-U, Order No. 1 at page 1 (Mar. 4, 2021)

<sup>11</sup> M. Hennigan, *Summit Utilities exec addresses expensive gas bills*, Arkansas Times (Feb. 15, 2023), <https://arktimes.com/arkansas-blog/2023/02/15/summit-utilities-exec-addresses-expensive-gas-bills>.

19. Summit CEO Kurt Adams has stated, “The biggest issue people have though is the cost of energy and we’re looking at a price of gas this year that’s 36% higher than it was last year, people should be upset it’s [sic] been coming down and so there is some relief on the way, but the commodity price is high.”<sup>12</sup> He offered the following explanation for the high gas costs:

“When the war in Ukraine started and Russia eventually shut off the gas to Europe,” he added. “The consequence of that was that Europe started looking to other places for gas and they came to the United States because the United States has a very rich gas resource so every BTU of gas we use in Arkansas is actually competed for by the Europeans.”

Arkansas is now paying 35 % more for gas compared to last year – coupled with Winter Storm Elliott and Summit’s data issue – Adams said that created the perfect storm.

“For most folks that were billed last week, it picked up Winter Storm Elliott, so you have Winter Storm Elliott costs that people were just using a lot of gas to keep their house warm and then in addition to that, the price itself is very high,” he said.<sup>13</sup>

20. As the representative of Summit’s Arkansas ratepayers, the Attorney General believes that it is imperative that the Commission investigate the 35% increase in gas costs, passed

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<sup>12</sup> M. Glisovic, *Summit’s CEO apologizes for auto-draft issue, says March bills should be accurate*, KATV 7 On Your Side (Mar. 1, 2023), <https://katv.com/community/7-on-your-side/summits-ceo-apologizes-for-auto-draft-issue-says-march-bills-should-be-accurate>.

<sup>13</sup> M. Gilsovic, *7OYS investigation uncovers billing errors at Summit Utilities; 167K customers affected*, KATV 7 On Your Side (Jan. 30, 2023), <https://katv.com/community/7-on-your-side/7oys-investigation-uncovers-billing-errors-at-summit-utilities-167k-customers-affected>.

on to Summit's ratepayers, to determine whether the circumstances cited by Summit did in fact affect the price of natural gas to that degree, and whether Summit acted prudently in purchasing natural gas under those circumstances.

## **V. Billing Practices**

21. Section 5 of the Arkansas Public Service Commission's General Service Rules governs a public utility's billing practices.

22. The Commission's General Service Rules applicable to this situation include Rule 5.03 (Billing Periods and Standards), Rule 5.08 (Estimated Usage for Billing), Rule 5.10 (Levelized Billing Plans for Electric and Gas Utilities), Rule 5.16 and 5.17 (Meter Reading Requirements and Billing Metered Service), and Rule 5.19 (Billing Corrections), addressed below.

23. Rule 5.03 deals with billing periods and standards. It states in part that "[i]f a utility discovers a billing error, it shall promptly notify customers who may be affected."<sup>14</sup> The Commission should investigate to determine if affected customers were timely notified of Summit's admitted billing errors and of any other errors that may have occurred or missteps the Company may have made.

24. Rule 5.08 deals with billing based on estimated usage. It states that:

A utility may not estimate a customer's usage for more than 2 consecutive Bills. If a utility estimates usage, it shall use the customer's consumption for the same time at that location the year before. A utility may apply a weather-sensitive factor to the consumption in arriving at the current month's estimated usage. If no figures are

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<sup>14</sup> Arkansas Public Service Commission, General Service Rule 5.03 (E).

available for the current customer at that location for the previous year, a utility shall use the class average to estimate consumption.<sup>15</sup>

25. It appears that, for most customers, the estimated bills were only generated for one month and were subsequently corrected. However, the Commission should investigate to determine whether Summit complied with all aspects of Rule 5.08 when it issued tens of thousands of estimated bills to customers in a single month.

26. Rule 5.10 deals with levelized billing plans, which would include Summit's Average Monthly Billing program. This rule states in part that "[e]lectric and gas utilities must provide levelized billing plans for qualifying residential customers . . . . Applicants must be told about levelized billing plans when they apply for service."<sup>16</sup> The Commission should endeavor to determine whether Summit adequately informed customers regarding its Average Monthly Billing plan and otherwise complied with Rule 5.10.

27. Rule 5.15 deals with overpayment credits. It states in part that "[o]verpayments shall be credited to the customer's account unless the customer requests otherwise."<sup>17</sup> The erroneous bills Summit issued in January likely resulted in numerous overpayments by customers. The Commission should investigate to ensure that all overpayments were handled by Summit in compliance with Rule 5.15.

28. Rules 5.16 and 5.17 deal with meter reading requirements and billing for metered services. It states in part that "[b]ills for metered services must be based on meter readings unless otherwise provided in a Commission-approved tariff."<sup>18</sup> Based on the facts available, there are

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<sup>15</sup> *Ibid.* Rule 5.08.

<sup>16</sup> *Ibid.* Rule 5.10 (A) and (C)(1).

<sup>17</sup> *Ibid.* Rule 5.15 (A).

<sup>18</sup> *Ibid.* Rule 5.17 (A).

questions regarding whether Summit acted appropriately when it based some customer bills on factors other than meter readings, including estimated billing.

29. Rule 5.19 deals with billing corrections. Questions exist as to whether Summit has complied with Rule 5.19 regarding how it handled necessary corrections for incorrectly billed amounts.

30. Because of the facts and Rules described above, the Attorney General believes that Summit may have violated the General Service Rules. Summit's apparent violations warrant full investigation. Because billing practices are outside the scope of this docket, the Attorney General requests that the Public Service Commission open a new docket to investigate these apparent violations.

## **VI. Relief Sought**

31. The Attorney General respectfully requests that the Commission expand the scope of its investigation into the purchasing practices of CenterPoint and Summit to include an investigation of the companies' purchasing practices following Winter Storm Uri through March 31, 2023; and

32. The Attorney General respectfully requests that the Commission open a new docket to investigate potential violations of Section 5 of the Commission's General Service Rules (Billing).

WHEREFORE, the Attorney General respectfully requests the Commission issue an Order granting the relief requested above.

Respectfully submitted,

**TIM GRIFFIN**  
**Attorney General**

By: */s/ Clay Layson*  
Senior Assistant Attorney General  
Arkansas Bar No. 2009249  
323 Center Street, Suite 200  
Little Rock, AR 72201  
(501) 682-1321  
[Clay.layson@arkansasag.gov](mailto:Clay.layson@arkansasag.gov)

# **EXHIBIT A**

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**Account Information Regarding Recent Data Processing Issue**

1 message

**Summit Utilities Customer Service** <CustomerService@summitutilities.com>

Tue, Jan 31, 2023 at 9:37 AM

To: 

**THE RECENT BILL YOU RECEIVED IS INCORRECT. PLEASE REVIEW THIS MESSAGE AND LOG INTO YOUR CUSTOMER PORTAL TO VIEW YOUR NEW, CORRECTED BILL.**

1/31/2023

Dear Summit Customer,

The most recent bill you received, with a bill print date between January 17-24, 2023, displayed an estimated amount for the "Total Amount Due". The data processing issue that generated the estimated bills has now been corrected. Please disregard the previous billing invoice you received and utilize the new statement that's now available to you.

We apologize for this inconvenience. Please know the due date of your bill has been extended, no late fees will be charged, and if your payment posting is late due to the new bill issued it will not impact the "good standing" status of your payment history.

- If you are on an Average Monthly Billing (AMB) plan, a payment arrangement, or AutoPay no action is required.
- If your account is on AutoPay, the amount based on actual usage as opposed to estimated usage will be credited or owed and will be drafted from your account on the next billing cycle.

**Customer Service hours of operation are:**

**7:00 am to 7:00 pm CT, Monday – Friday**

**Arkansas and Texarkana: 800-992-7552**

**Oklahoma: 866-275-5265**

*\*Should you reach out to our customer service team, please continue to follow the automated prompts to reach one of our helpful team members. The option to connect with a representative occurs about two minutes into our automated voice-recording system.*

Thank you for your business. We apologize again for the inconvenience.

Sincerely,

Fred Kirkwood, Chief Customer Experience Officer

Summit Utilities

# **EXHIBIT B**



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Service Address [REDACTED]

Rate Code: AR02SCS1

**What Do I Owe?**  
**\$603.43**

Account [REDACTED]

When is it due?  
**02/16/2023**

**WHAT DO I NEED TO KNOW?**

- Gas supply charges have recently increased due to rising commodity costs — impacting your bill. Summit does not make a profit off the Gas Supply Rate (GSR). You pay what we pay, and the cost is a direct pass-through. To learn more visit SummitUtilities.com/Bill101.
- If you were on ebill and are receiving a paper bill, your billing preferences were not transferred over. Visit MySummitAccount.com to create an online account and update your billing preferences. If you need assistance, contact Customer Service.

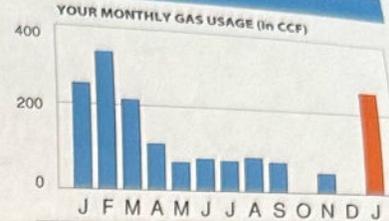
Bill Date **01/24/2023** Mail Date **01/25/2023**  
Estimate Meter# [REDACTED]

Meter Read Dates	Current Reading	Previous Reading
12/20/22-01/23/23	2016	1756

Volume	Pressure Factor	Pressure Correction	FINAL Consumption
260	1	1	260

**TOTAL CONSUMPTION 260 CCF**



Your current gas charges for 34 days usage **\$13.34 per day**

Days in Billing Cycle: Jan 2022 31, Jan 2023 34  
 HDD's in Billing Cycle: 699, 614  
 Actual Usage, CCF: 251, 260  
 A Heating Degree Day (HDD) is a measure of coldness used by the National Weather Service. Colder weather will increase the degree day count.

**WHAT MAKES UP MY BILL?**

Previous Balance	Late Fee	Payments/Credits	Last Payment Date	Balance Forward
\$0.00	\$0.00	\$0.00		\$0.00

Category	Amount
<b>Delivery and Service Charges</b>	<b>\$66.95</b>
Customer Charge	\$17.24
Distribution Rate	260.00000 @ \$0.174910 \$45.48
EE Cost Rate	260.00000 @ \$0.015000 \$3.90
Customer Credit Rider	\$-6.11
SSER	260.00000 @ \$0.003900 \$1.01
Weather Normalization Adj	182.00000 @ \$0.029824 \$5.43
<b>Supply Charges</b>	<b>\$298.29</b>
Gas Supply Rate	260.00000 @ \$1.14727 \$298.29
<b>Tax and Other Charges</b>	<b>\$88.19</b>
Camden City Franchise Fee	\$2.50
Camden City Tax 1.75%	\$6.44
Ouachita County Tax 2.00%	\$7.35
Arkansas State Sales Tax 6.50%	\$23.90
Initiation Fee-Existing Meter	\$48.00
<b>Adjustment/Agreements</b>	<b>\$150.00</b>
Deposit Agreement \$150.00	
Amount Paid (\$0.00)	
Deposit Balance	\$150.00

**Account Summary**  
 Current Statement Charges \$603.43  
**Total Amount Due by 02/16/2023 \$603.43**



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Call your SUA office at 800-992-7552 concerning billing, service, or to discuss payment arrangements.

**PAY BY PHONE: 844-471-0064**  
**PAY ONLINE: SummitUtilities.com and enroll in paperless billing.**

**Total Amount Due by 02/16/2023 \$603.43**

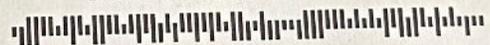
Amount due if received after due date: **\$617.90**

Summit Heating Assistance Fund Contribution  
 \$10  \$5  \$1  or \$\_\_\_\_\_.00

Amount Enclosed \$



SUMMIT UTILITIES ARKANSAS INC  
 PO BOX 676344  
 DALLAS TX 75267-6344



0006807000011000

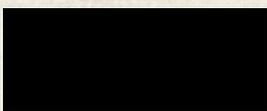
CORRECTED

Account: [REDACTED]



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Service Address



What Do I Owe?  
**\$242.60**

When Is It Due?  
**02/22/2023**

WHAT DO I NEED TO KNOW?

- Gas supply charges have recently increased due to rising commodity costs — impacting your bill. Summit does not make a profit off the Gas Supply Rate (GSR). You pay what we pay, and the cost is a direct pass-through. To learn more visit SummitUtilities.com/Bill101.
- If you were on ebill and are receiving a paper bill, your billing preferences were not transferred over. Visit MySummitAccount.com to create an online account and update your billing preferences. If you need assistance, contact Customer Service.

WHAT HAVE I USED?

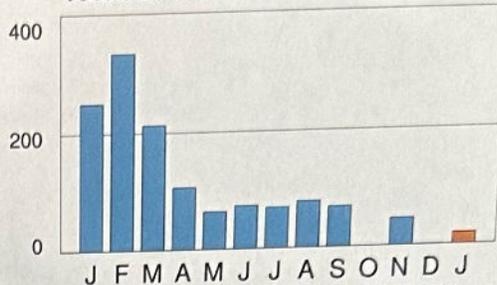
Bill Date **01/30/2023** Mail Date **01/30/2023**  
Normal Meter# [REDACTED]

Meter Read Dates	Current Reading	Previous Reading
12/20/22-01/23/23	1776	1756

Volume	x	Pressure Factor	x	Pressure Correction	=	FINAL Consumption
20		1		1		20
<b>TOTAL CONSUMPTION</b>						<b>20 CCF</b>

YOUR MONTHLY GAS USAGE (in CCF)



	Jan 2022	Jan 2023
Days in Billing Cycle	31	34
HDD's in Billing Cycle	699	614
Actual Usage, CCF	251	20

A Heating Degree Day (HDD) is a measure of coldness used by the National Weather Service. Colder weather will increase the degree day count.

Your current gas charges for 34 days usage

**\$2.72**  
per day

WHAT MAKES UP MY BILL?

Previous Balance	Late Fee	Payments/Credits	Last Payment Date	Balance Forward
\$0.00	\$0.00	\$0.00		\$0.00

Category	Amount
<b>Delivery and Service Charges</b>	<b>\$15.01</b>
Customer Charge	\$17.24
Distribution Rate	20.00000 @ \$0.174910 \$3.50
EE Cost Rate	20.00000 @ \$0.015000 \$0.30
Customer Credit Rider	-\$6.11
SSER	20.00000 @ \$0.003900 \$0.08
<b>Supply Charges</b>	<b>\$22.94</b>
Gas Supply Rate	20.00000 @ \$1.14700 \$22.94

Category	Amount
<b>Tax and Other Charges</b>	<b>\$54.65</b>
Camden City Franchise Fee	\$2.50
Camden City Tax 1.75%	\$0.71
Ouachita County Tax 2.00%	\$0.81
Arkansas State Sales Tax 6.50%	\$2.63
Initiation Fee-Existing Meter	\$48.00

Category	Amount
<b>Adjustment/Agreements</b>	<b>\$150.00</b>
Deposit Agreement \$150.00	
Amount Paid (\$0.00)	\$150.00
Deposit Balance	

Account Summary	
Current Statement Charges	\$242.60
<b>Total Amount Due by 02/22/2023</b>	<b>\$242.60</b>

Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414  
Call your SUA office at 800-992-7552 concerning billing, service, or to discuss payment arrangements.



PAY BY PHONE: 844-471-0064  
PAY ONLINE: SummitUtilities.com and enroll in paperless billing.

Total Amount Due by 02/22/2023

**\$242.60**

Amount due if received after due date: **\$249.85**

Summit Heating Assistance Fund Contribution  
\$10  \$5  \$1  or \$ \_\_\_\_\_00

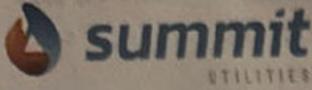
Amount Enclosed \$

SUMMIT UTILITIES ARKANSAS INC  
PO BOX 676344  
DALLAS TX 75267-6344



00300070001A

# **EXHIBIT C**



CUSTOMER

SERVICE ADDRESS

ACCOUNT NUMBER

DATE MAILED

Oct 21, 2022

DATE DUE

Page 1 of 4

Nov 14, 2022

AMOUNT DUE

\$ 44.19

**Gas leak or emergency**

Leave immediately, then call 800-992-7552, 24 hours a day

**Customer service**

800-992-7552 toll-free Monday - Friday, 7 am - 7 pm

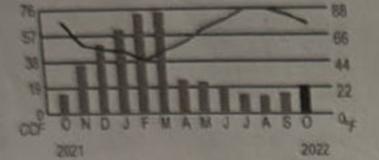
**Call before you dig**

Call 811 24 hours a day

**Comments**

PO Box 2628 Houston, TX 77252-2628

**Your usage in a glance**



	1 year ago	Last month	This month
Total CCF used	15	15	20
Average daily gas use (CCF)	0.5	0.5	0.6
Average daily temperature	74	80	72
Days in billing period	29	30	33

To better understand your home energy usage and learn energy savings tips, visit [CenterPointEnergy.com/myenergyanalyzer](http://CenterPointEnergy.com/myenergyanalyzer)

**Customer credit rider:** A benefit to the customer resulting from SUA's acquisition of facilities in Arkansas that provides a reduction to charges beginning February 1, 2022. For more information, please visit [www.summitutilities.com/rates](http://www.summitutilities.com/rates)

To report gas leaks, carbon monoxide and other gas emergencies, please call 800-992-7552. We appreciate your understanding that billing inquiries cannot be answered on this line.

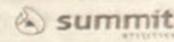
Pay your next bill without lifting a finger. To enroll in AutoPay, just sign and date the back of your bill stub and return to us with a check for your payment amount. It's that easy!

**ACCOUNT SUMMARY**

Previous gas amount due	\$ 38.33
Payment Oct 11, 2022	- 38.33
Current gas charges (Details on page 2)	+ 44.19
<b>Total amount due</b>	<b>* \$ 44.19</b>

\* The amount due after Nov 14, 2022 is \$ 47.47, which includes a late charge of \$ 3.28.

**Important Changes Are Coming Soon!** Later this fall, CenterPoint Energy will be completing the secure transition of customer service and billing services to Summit Utilities as part of the recent acquisition. You will see many changes, including a new account number and more! Please read the enclosed insert and visit [SummitUtilities.com](http://SummitUtilities.com) for updates.



**How to pay your bill**

**Online**

Visit: [CenterPointEnergy.com/paybill](http://CenterPointEnergy.com/paybill) Pay immediately, schedule a payment or set up automatic monthly payments.

**Phone**

Call 800-992-7552 and make a payment using your checking or savings account, or by debit or credit card.

**In person**

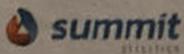
To find a payment location, visit: [CenterPointEnergy.com/paybill](http://CenterPointEnergy.com/paybill) or call 800-992-7552.

**Mail**

Return the payment stub below, with your check or money order, using the return envelope.

Please keep this portion for your records

Please return this portion with your payment. Please do not include letters or notes.



Good Neighbor Fuel Fund Contribution

\$10  \$5  \$1  or \$ \_\_\_\_\_ .00

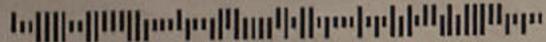
00010114 01 AV 0.45 1

Enroll in AutoPay today. See form on the back of this stub.

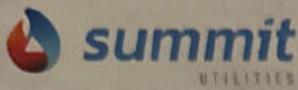
ACCOUNT NUMBER [REDACTED]  
DATE DUE Nov 14, 2022  
AMOUNT DUE \$ 44.19

Write account number on check and make payable to CenterPoint Energy.

\$ \_\_\_\_\_  
Please enter amount of your payment



CENTERPOINT ENERGY  
PO BOX 4583  
HOUSTON TX 77210-4583



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Service Address

Rate Code: AR02RS1

Account: [REDACTED]

What Do I Owe?  
**\$130.58**

When Is It Due?  
**12/14/2022**

**WHAT DO I NEED TO KNOW?**

If you were on ebill and are receiving a paper bill, your billing preferences were not transferred over. Visit MySummitAccount.com to create an online account and update your billing preferences. If you need assistance, contact Customer Service.

**WHAT HAVE I USED?**

Bill Date: 11/21/2022 Mail Date: 11/21/2022  
Normal Meter# [REDACTED]

Meter Read Dates	Current Reading	Previous Reading
10/19/22-11/16/22	3272	3232

Volume	Pressure Factor	Pressure Correction	FINAL Consumption
40	1	1	40
<b>TOTAL CONSUMPTION</b>			<b>40 CCF</b>

YOUR MONTHLY GAS USAGE (in CCF)



Your current gas charges for 28 days usage

**\$3.09**  
per day

	Nov 2021	Nov 2022
Days in Billing Cycle	30	28
HDD's in Billing Cycle	434	229
Actual Usage, CCF	36	40

A Heating Degree Day (HDD) is a measure of coldness used by the National Weather Service. Colder weather will increase the degree day count.

**WHAT MAKES UP MY BILL?**

Previous Balance	Late Fee	Payments/Credits	Last Payment Date	Balance Forward
\$44.19	\$0.00	\$0.00		\$44.19

Delivery and Service Charges		\$26.63
Customer Charge		\$11.00
Distribution Rate	15.00000 @ \$0.463690	\$6.96
Distribution Rate	25.00000 @ \$0.374100	\$9.35
EE Cost Rate	40.00000 @ \$0.031500	\$1.26
Customer Credit Rider		\$-2.66
SSER	40.00000 @ \$0.008480	\$0.34
Weather Normalization Adj	25.00000 @ \$0.015290	\$0.38
Supply Charges		\$48.97
Gas Supply Rate	40.00000 @ \$1.22425	\$48.97

Tax and Other Charges		\$10.79
Little Rock City Franchise Fee		\$3.93
Little Rock City Tax 1.13%		\$0.99
Pulaski County Tax 1.00%		\$0.80
Arkansas State Sales Tax 6.50%		\$5.17

**Account Summary**

Current Statement Charges	\$86.39
<b>Total Amount Due by 12/14/2022</b>	<b>\$130.58</b>



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Call your SUA office at 800-992-7552 concerning billing, service, or to discuss payment arrangements.

Account: [REDACTED]

Total Amount Due by 12/14/2022

**\$130.58**

Amount due if received after due date: **\$135.59**

PAY BY PHONE: 844-471-0064  
PAY ONLINE: SummitUtilities.com and enroll in paperless billing.

Summit Heating Assistance Fund Contribution

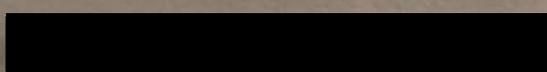
\$10  \$5  \$1  or \$\_\_\_\_\_00

Amount Enclosed \$

P: 010624 - LYNNNNN



SUMMIT UTILITIES ARKANSAS INC  
PO BOX 676344  
DALLAS TX 75267-6344



01062430401

CORRECTED



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Service Address

Rate Code: ARO2RS1

Account: [REDACTED]

What Do I Owe?  
**\$278.86**

When Is It Due?  
**02/22/2023**

**WHAT HAVE I USED?**

Bill Date **01/30/2023** Mail Date **01/30/2023**  
Normal Meter# [REDACTED]

Meter Read Dates	Current Reading	Previous Reading
12/14/22-01/17/23	3452	3338

Volume	Pressure Factor	Pressure Correction	FINAL Consumption
114	1	1	114
<b>TOTAL CONSUMPTION</b>			<b>114 CCF</b>

YOUR MONTHLY GAS USAGE (in CCF)



	Jan 2022	Jan 2023
Days in Billing Cycle	31	34
HDD's in Billing Cycle	699	643
Actual Usage, CCF	61	114

A Heating Degree Day (HDD) is a measure of coldness used by the National Weather Service. Colder weather will increase the degree day count.

Your current gas charges for 34 days usage

**\$6.90**  
per day

**WHAT MAKES UP MY BILL?**

Previous Balance	Late Fee	Payments/Credits	Last Payment Date	Balance Forward
\$180.83	\$0.00	-\$136.64	01/05/2023	\$44.19

Delivery and Service Charges		\$65.84
Customer Charge		\$11.00
Distribution Rate	15.00000 @ \$0.463690	\$6.96
Distribution Rate	99.00000 @ \$0.374100	\$37.04
EE Cost Rate	114.00000 @ \$0.031930	\$3.64
Customer Credit Rider		\$-3.14
SSER	114.00000 @ \$0.013010	\$1.48
Weather Normalization Adj	99.00000 @ \$0.089478	\$8.86
Supply Charges		\$139.52
Gas Supply Rate	114.00000 @ \$1.22386	\$139.52

Tax and Other Charges		\$29.31
Little Rock City Franchise Fee		\$10.68
Little Rock City Tax 1.13%		\$2.43
Pulaski County Tax 1.00%		\$2.16
Arkansas State Sales Tax 6.50%		\$14.04

**Account Summary**

Current Statement Charges	\$234.67
<b>Total Amount Due by 02/22/2023</b>	<b>\$278.86</b>

Account: [REDACTED]



Summit Utilities Arkansas  
PO Box 2414 | Fort Smith, AR 72902-2414

Call your SUA office at 800-992-7552 concerning billing, service, or to discuss payment arrangements.

Total Amount Due by 02/22/2023

**\$278.86**

Amount due if received after due date: **\$286.84**

PAY BY PHONE: 844-471-0064

PAY ONLINE: SummitUtilities.com and enroll in paperless billing.

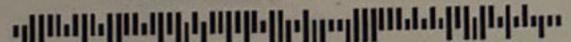
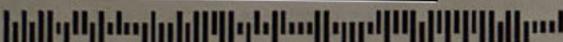
Summit Heating Assistance Fund Contribution  
\$10  \$5  \$1  or \$\_\_\_\_,00

Amount Enclosed \$

P: 010174 -- EYNNNNN



SUMMIT UTILITIES ARKANSAS INC  
PO BOX 676344  
DALLAS TX 75267-6344



# **EXHIBIT D**



**Summit Utilities Arkansas**  
PO Box 2414 | Fort Smith, AR 72902-2414

**Service Address**

Rate Code: **AR02RS1**

Account: [REDACTED]

APSC FILED Time: 3/16/2023 1:59:29 PM; Recvd: 3/16/2023 1:49:08 PM; Docket 07-044-U-Doc: 139

**What Do I Owe?**

**\$867.14**

**When is it Due?**

**03/13/2023**

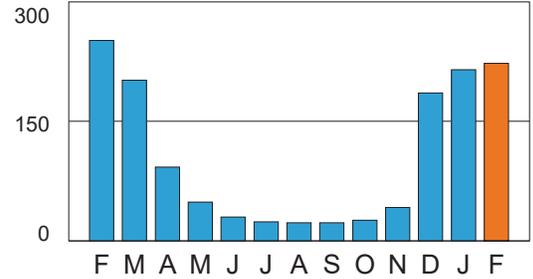
**WHAT HAVE I USED?**

Bill Date **02/16/2023** Mail Date **02/17/2023**  
Normal Meter# [REDACTED]

Meter Read Dates	Current Reading	Previous Reading
01/13/23-02/14/23	7931	7708

Volume	x	Pressure Factor	x	Pressure Correction	=	FINAL Consumption
223		1		1		223
<b>TOTAL CONSUMPTION</b>						<b>223 CCF</b>

**YOUR MONTHLY GAS USAGE (in CCF)**



	Feb 2022	Feb 2023
Days in Billing Cycle	28	32
HDD's in Billing Cycle	565	624
Actual Usage, CCF	252	223

A Heating Degree Day (HDD) is a measure of coldness used by the National Weather Service. Colder weather will increase the degree day count.

Your current gas charges for 32 days usage

**\$13.71**  
per day

**WHAT MAKES UP MY BILL?**

Previous Balance	Late Fee	Payments/Credits	Last Payment Date	Balance Forward
\$428.30	\$0.00	\$0.00		\$428.30

Delivery and Service Charges		\$111.09
Customer Charge		\$11.00
Distribution Rate	15.00000 @ \$0.463690	\$6.96
Distribution Rate	208.00000 @ \$0.374100	\$77.81
EE Cost Rate	223.00000 @ \$0.031928	\$7.12
Customer Credit Rider		\$-3.14
SSER	223.00000 @ \$0.012980	\$2.89
Weather Normalization Adj	208.00000 @ \$0.040622	\$8.45
Supply Charges		\$272.94
Gas Supply Rate	223.00000 @ \$1.22395	\$272.94

Tax and Other Charges		\$54.81
Little Rock City Franchise Fee		\$19.97
Little Rock City Tax 1.13%		\$4.54
Pulaski County Tax 1.00%		\$4.04
Arkansas State Sales Tax 6.50%		\$26.26

**Account Summary**

Current Statement Charges	\$438.84
<b>Total Amount Due by 03/13/2023</b>	<b>\$867.14</b>



**Summit Utilities Arkansas**  
PO Box 2414 | Fort Smith, AR 72902-2414

Call your SUA office at 800-992-7552 concerning billing, service, or to discuss payment arrangements.

Account: [REDACTED]

✓ **Automatic Payment - Do Not Pay**

**Total Amount Due by 03/13/2023**

**\$867.14**

**PAY BY PHONE: 844-471-0064**

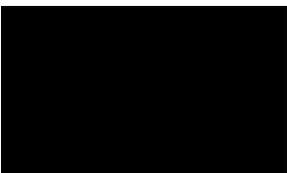
**PAY ONLINE: SummitUtilities.com and enroll in paperless billing.**

Amount due if received after due date: **\$886.88**

Summit Heating Assistance Fund Contribution

\$10  \$5  \$1  or \$\_\_\_\_\_00

**Amount Enclosed \$**



SUMMIT UTILITIES ARKANSAS INC  
PO BOX 676344  
DALLAS TX 75267-6344



**CERTIFICATE OF SERVICE**

I, Clay Layson, hereby certify that on March 16, 2023, I filed a copy of the foregoing utilizing the Commission's Electronic Filing System, which caused a copy to be served upon all parties of record via electronic mail.

/s/ Clay Layson  
Clay Layson